



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

**VIA ECF**

August 16, 2019

Hon. Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
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Re: *Blassingame v. Gardner, et al., 18-cv-8767 (NRB)*

Dear Judge Buchwald:

This Office represents Defendants in the above-referenced action. I write jointly with the consent of Plaintiff's counsel to provide the Court with a status report.

Since the parties' last joint letter, the remaining defendants have been deposed and fact discovery is nearing completion. Defendants have requested Plaintiff's medical release for one additional provider and anticipate that a deposition of one non-party fact witness may be necessary. Defendants also anticipate that limited expert discovery may be necessary, at which point Defendants will be in a better position to respond to Plaintiff's outstanding settlement demand.

Counsel propose providing the Court with a further status update within 60 days, by <sup>Application</sup> ~~August 16~~ <sup>by Plaintiff's</sup> ~~October 16, 2019.~~ <sup>Naomi Reice Buchwald</sup>

Respectfully submitted,

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cc: Nicole Bellina, Esq. (by ECF)